

EXHIBIT C

From: Herring, Angela K. <AKHerring@wlrk.com>
Sent: Thursday, August 1, 2019 8:44 AM
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Subject: RE: Third Supplemental Document Requests to AAFAF/PREPA/OB

Ashley,

We are writing with respect to Judge Dein's ruling that documents relating to the Fuel Lines' current expense/priority position — including documents from January 1, 2012 through the present — must be produced and direction that the parties meet and confer regarding production criteria.

We propose the following targeted search criteria, but note that our search terms and custodians are suggestions based on the information available to us. PREPA is the best source of information about which individuals are most likely to have documents and information relating to the Fuel Lines, and what terminology, abbreviations, shorthands, etc. might have been used by PREPA personnel in connection with the Fuel Lines and Current Expense discussions. We particularly need guidance regarding the Spanish terms that were used. We therefore request that you provide us with comments and additions based on PREPA's own diligence.

1. Date Range: Jan. 1, 2012 – present
2. Custodians
 - a. Otoniel Cruz Carrillo
 - b. Josue Antonio Colon Ortiz
 - c. Jose Roque Torres
 - d. Christian Sobrino
3. Search Terms
 - a. Any of the following:
 - i. "current expense*" or "gastos corrientes" or "gastos recurrentes" or "gastos ordinaries"
 - ii. net /3 revenue*
 - iii. (sinking general) /2 fund
 - iv. senior*
 - v. junior*
 - vi. subordinat* or subordinad*
 - vii. priority or priorid*
 - viii. "trust agreement" or "acuerdo de fideicomiso" or "contrato de fideicomiso"
 - ix. bonds or bonos or bondholder* or bonista*
 - b. In a document with any of the following:
 - i. "Fuel Line*"
 - ii. "línea de combustible"
 - iii. "financiamiento combustible"
 - iv. "line of credit" /30 (scotia* SB SBPR)
 - v. "line of credit" /30 citi*
 - vi. "credit agreement" /30 (scotia* SB SBPR)
 - vii. "credit agreement" /30 citi*
 - viii. "línea de crédito" /30 (scotia* SB SBPR)
 - ix. "línea de crédito" /30 citi*
 - x. "trade finance" /30 citi*
 - xi. (finan! /s comercial) /30 citi*
 - xii. Facilidad /30 (citi* scotia* SB SBPR)
 - xiii. Facility /30 (citi* scotia* SB SBPR)
4. Additional collections requested:
 - a. PREPA's electronic or hard copy loan files relating to the Fuel Lines
 - b. Any text messages from custodians relating to the Fuel Lines

Please also confirm that PREPA has retained all electronic and hard copy files relating to the Fuel Lines dating back to at least January 1, 2012. If there are any gaps in retention of electronic or hard-copy documents, please identify and explain them.

With respect to our Third Supplemental Requests, we agree that appropriate search criteria such as those outlined above should, for the most part, adequately respond to those requests as well. However, to the extent the Government Parties relied on any documents in making the referenced statements in the Second Supplemental Memorandum, those documents should be produced and identified regardless of whether they are captured by agreed-to search criteria.

In addition, in light of the Court's ruling that documents produced in the receivership litigation may be used in this litigation, please send us those productions.

Finally, in light of the Court's direction at the hearing, please confirm that PREPA's 30(b)(6) witness will be prepared to address Topic 4 of the Rule 30(b)(6) notice.

We are available to meet and confer. Given the litigation schedule and the delay resulting from PREPA's unwillingness to produce these responsive documents until required by the Court, we would appreciate a response as soon as practicable. All rights are reserved, including as to the schedule.

Regards,
Angie

From: Pavel, Ashley <apavel@omm.com>

Sent: Wednesday, July 31, 2019 10:01 PM

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jramirez@amrclaw.com
Subject: RE: Third Supplemental Document Requests to AAFAF/PREPA/OB

*** EXTERNAL EMAIL ***

Angie,

We wanted to follow up regarding the Fuel Line Lenders' third set of supplemental document requests, our responses to which are due on Friday. In light of statements at the hearing, it appears to us that the materials sought in the Fuel Line Lenders' third set of supplemental discovery requests are entirely cumulative of Requests 5, 6, 22 and 23 from the first set of document requests. To the extent you see the requests differently, we would like to meet and confer so that we can understand what additional materials are being sought.

With respect to Requests 5, 6, 8-10, 22 and 23, consistent with Judge Dein's order that the parties meet and confer to narrow these requests, we are working with PREPA to determine what is readily available. We anticipate being in a position to send you a proposal late this week or early next week.

Best,
Ashley

From: Herring, Angela K. <AKHerring@wlrk.com>

Sent: Friday, July 26, 2019 7:21 AM

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Subject: RE: Third Supplemental Document Requests to AAFAF/PREPA/OB

Ashley,

Yes, we agree to extend your deadline to respond to August 2.

Best,
Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz

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*** EXTERNAL EMAIL ***

Angela-

We are in receipt of these requests. We propose to respond on Friday, August 2, 2019, which will allow our response to reflect any guidance we receive from Judge Dein at the July 30 hearing. Please let us know if that is acceptable to you.

Best,
Ashley

O'Melveny

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Sent: Tuesday, July 23, 2019 8:20 PM

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Subject: Third Supplemental Document Requests to AAFAF/PREPA/OB

Counsel:

Please see the attached *Third Set of Supplemental Document Requests of Cortland Capital Market Services LLC, As Administrative Agent, and Solus to Financial Oversight and Management Board for Puerto Rico, the Puerto Rico Electric Power Authority, and the Puerto Rico Fiscal Agency and Financial Authority*. We are available to meet and confer regarding these requests.

Regards,

Angela K. Herring

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Thank you in advance for your cooperation and assistance.

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